

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

In re: Debtor(s) name(s) used by the debtor(s) in the last 8 years, including married, maiden, and trade):

Michael Anthony Cuff
Debtor 1

Nationstar Mortgage, LLC d/b/a Mr. Cooper
Movant(s)

v.

Michael Anthony Cuff
Tabitha A. Bosack (Non-Filing Co-Debtor)

Respondent(s)

Jack N. Zaharopoulos, Esquire
Standing Chapter 13 Trustee
Additional Respondent

Chapter 13

Case No. 1:21-BK-02542-HWV

Matter: Motion for Relief from the Automatic Stay

Document No. 26

**DEBTOR(S)' ANSWER TO MOVANT(S)' MOTION
FOR RELIEF FROM THE AUTOMATIC STAY**

AND NOW, come the Debtor(s), Michael Anthony Cuff, through their attorney, Paul D. Murphy-Ahles, Esquire and DETHLEFS PYKOSH & MURPHY, who files the within Debtor(s)' Answer to Movant(s)' Motion for Relief from the Automatic Stay and aver as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Upon information and belief, the averments as stated in Paragraph 4 are admitted.
5. Admitted.
6. Upon information and belief, the averment as stated in Paragraph 6 is admitted.
7. Admitted. Debtor(s) stand ready to bring their account current per stipulation terms agreeable the parties.
8. Admitted. Debtor(s) stand ready to bring their account current per stipulation terms agreeable to the parties.
9. Paragraph 9 contains a conclusion of law to which no response is required.
10. Denied in part. Debtor(s) are without sufficient knowledge as to the truth of the averment in Paragraph indicating that Movant(s) incurred legal fees; therefore, it is denied. The remaining averments as stated in Paragraph 10 contains a conclusion of law to which no response is required.
11. Paragraph 11 contains a conclusion of law to which no response is required.

WHEREFORE, Debtor(s) requests this Court deny the requested relief.

Respectfully submitted,
DETHLEFS PYKOSH & MURPHY

Date: April 19, 2022

/s/ Paul D. Murphy-Ahles

Paul D. Murphy-Ahles, Esquire
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Attorney for Debtor(s)

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CERTIFICATE OF SERVICE

I hereby certify that on Tuesday, April 19, 2022, I served a true and correct copy of the **Debtor(s)' Answer to Movant(s)' Motion for Relief from the Automatic Stay** in this proceeding via electronic means upon the following:

Rebecca Solarz, Esquire
KML Law Group, PC
701 Market Street, Suite 5000
Philadelphia, PA 19106
Counsel for Movant(s)

Jack H. Zaharopoulos, Esquire
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036

Office of the United States Trustee
Ronald Reagan Federal Building
228 Walnut Street, Room 1190
Harrisburg, PA 17101

/s/ Kathryn S. Greene

Kathryn S. Greene, RP®, Pa.C.P.
Paralegal for Paul D. Murphy-Ahles, Esquire